FILED IN CHAMBERS
U.S.D.C ATLANTA

Date: Mar 11 2026

KEVIN P. WEIMER, Clerk

By: James Jarvis
Deputy Clerk

# United States District Court

NORTHERN DISTRICT OF GEORGIA

UNITED STATES OF AMERICA

v.

MATTHEW ALAN SOUZA

**CRIMINAL COMPLAINT**

Case Number: 1:26-MJ-275

I, the undersigned complainant depose and say under penalty of perjury that the following is true and correct to the best of my knowledge and belief. On or about March 8, 2026 in Gwinnett County, in the Northern District of Georgia, defendant(s) did, buy a firearm from a federally licensed firearms dealer and in so doing knowingly made a false or fictitious oral or written statement that was intended to deceive the dealer and the subject matter of the false statement was material to the lawfulness of the sale.

in violation of Title 18, United States Code, Section(s) 922(a)(6).

I further state that I am a(n) Special Agent of the FBI and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes

/s/ Jesse Bailey
Signature of Complainant
Jesse Bailey III

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

March 10, 2026
Date

at Atlanta, Georgia
City and State

CHRISTOPHER C. BLY
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer

Signature of Judicial Officer

AUSA Chloe Cobb Smith
Chloe.Smith@usdoj.gov

I, Jesse Bailey III, depose and say under penalty of perjury as follows:

## INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation and have been since 2024. I am currently assigned to the Atlanta Field Division of the FBI and am currently assigned to the Domestic Terrorism squad, and I have received extensive training in federal criminal matters and investigative techniques while attending the New Agent Training at Quantico, Virginia and continue to receive training related to domestic terrorism matters through the FBI and our local partners. In my duties as a special agent, I am currently part of the Joint Terrorism Task Force, and I am responsible for the investigation of domestic terrorism activities. I have investigated federal criminal violations which are intended to intimidate or coerce a civilian population, influence the policy of a government by intimidation or coercion, or affect the conduct of a government by mass destruction, assassination, or kidnapping. Through my training and experience, I have become knowledgeable in the tactics and techniques used by domestic and foreign terrorists and others who perpetrate or threaten acts of violence, including the means by which such individuals communicate and plan operations. As part of these investigations and others, I have participated in physical surveillance, worked with confidential human sources, conducted interviews, served subpoenas, and executed search, seizure, and arrest warrants. I have also conducted interviews on numerous persons involved in violent crimes.

2. I make this affidavit in support of an application for the issuance of a criminal complaint and arrest warrant for MATTHEW ALAN SOUZA for a

violation of Title 18, United States Code, Section 922(a)(6), false statements in firearm purchases.

## SOURCES OF INFORMATION

3. The information set forth in this affidavit is based on my personal observations and knowledge, and may also be based on: (a) my training and experience, (b) information obtained from other individuals participating in the investigation, (c) reports and/or business records, (d) recorded conversations, and (e) communications with other individuals who have personal knowledge of the events and circumstances described herein. Since this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included in this affidavit every detail of the investigation. Rather, I have set forth facts that I believe are sufficient to establish probable cause that federal laws have been violated. Unless specifically indicated otherwise, any conversations and statements described in this affidavit are related in substance and in part only.

## PROBABLE CAUSE

4. On March 8, 2026 MATTHEW ALAN SOUZA purchased three guns at a Gun Show in the Northern District of Georgia. SOUZA paid $1,112.40 for two rifles and a handgun.

5. During the purchase of the firearms, SOUZA listed 901 Sapphire Ln. Sugar Hill, Georgia 30518 as his residence on the ATF Form 4473.

6. 901 Sapphire Ln. Sugar Hill, Georgia 30518 was sold by Renato Souza (SOUZA's father) in 2023 to Brett James Ray. Brett Ray James and Donna Cynthia Ray are the sole listed owners of the property.

7. On March 10, 2026, agents spoke with Donna Ray via telephone. Donna Ray lives with her husband, Brett Ray, at 901 Sapphire Ln. Sugar Hill, Georgia 30518. Donna and Brett Ray have lived at the residence since July 2023. SOUZA does not rent a room at the location and has had no known ties to the residence since July 2023.

8. After 901 Sapphire Ln. was sold to Brett Ray, SOUZA resided at 1524 Laurel Crossing Parkway, Apt. 124, Buford, GA 30158 but was released from his lease due to nonpayment.

9. Agents reviewed historical Flock camera data and recent vehicle-movement information that showed SOUZA has not appeared near the vicinity of 901 Sapphire Ln. for an extended period of time.

## CONCLUSION

10. Based on the investigative findings described above, I submit there is now probable cause to believe that, on March 8, 2026, MATTHEW ALAN SOUZA

violated Title 18, United States Code, Section 922(a)(6) (false statements in firearm purchases).

**END OF AFFIDAVIT**